

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
ANDREW WONG
3 Assistant Federal Public Defender
Nevada State Bar No. 14133
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Andrew_Wong@fd.org

7 Attorney for Christopher Canton

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CHRISTOPHER CANTON,

15 Defendant.

Case No. 2:12-cr-276-APG-VCF

SECOND UNOPPOSED MOTION TO
MODIFY CONDITIONS OF
PREHEARING RELEASE

16
17 COMES NOW the defendant, Christopher Canton, by and through his counsel of record,
18 ANDREW WONG, Assistant Federal Public Defender, and hereby moves this Honorable Court
19 for a motion to modify a special condition of prehearing release. This request is based on the
20 Points attached hereto. Mr. Canton requests removal of the location monitoring and curfew
21 conditions and the imposition of a condition that he not obtain a passport.

22 DATED: April 1, 2020.

23 RENE L. VALLADARES
24 Federal Public Defender

25 By: /s/ Andrew Wong

26 ANDREW WONG
Assistant Federal Public Defender
Attorney for Christopher Canton

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FACTUAL BACKGROUND

On July 11, 2019, Mr. Canton made his initial appearance on a petition alleging he violated the terms of his supervised release. ECF No. 89. The magistrate judge held a detention hearing the same day and ordered Mr. Canton released on his present conditions of supervised release with the additional condition of home detention.

On September 24, 2019, the Court modified Mr. Canton's condition of release to replace the home detention condition with a curfew condition, to be enforced by his probation officer. ECF No. 97.

After discussion between the U.S. Probation Office, the U.S. Attorney's Office, and undersigned counsel, Mr. Canton now petitions this Court to remove the location monitoring and curfew conditions. ECF No. 89, 97. In its place, the parties agree to the addition of a condition that Mr. Canton not obtain a passport.

ARGUMENT

Since his release on July 11, 2019, Mr. Canton has complied with the conditions of his home detention. Mr. Canton has made great efforts to adjust his work schedule around the requirements of home detention. Mr. Canton's job often requires him relocate to different job sites during the workday on short notice. Since the Court modified Mr. Canton's conditions of release to a curfew, Mr. Canton has been able to maintain stable employment and attend to his family responsibilities.

Mr. Canton now requests the Court remove the location monitoring and curfew conditions as they are no longer necessary to ensure his compliance with the other conditions of release. Mr. Canton's assigned probation officer and the U.S. Attorney's office do not

1 oppose this request. The parties agree that the Court should impose a condition that Mr. Canton
2 not obtain a passport.
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6 Respectfully submitted,
7 RENE L. VALLADARES
8 Federal Public Defender

9 By: /s/ Andrew Wong

10 ANDREW WONG
11 Assistant Federal Public Defender
12 Attorney for Christopher Canton
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Christopher Canton,

Defendant.

Case No. 2:12-cr-276-APG-VCF

ORDER

IT IS THEREFORE ORDERED that Mr. Canton's prehearing release is modified as follows:

- 1) The condition for Location Monitoring is removed.
- 2) The condition for Curfew is removed.
- 3) The condition that Mr. Canton not obtain a passport is added.

DATED: April 2, 2020.



UNITED STATES MAGISTRATE JUDGE

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That on April 1, 2020, he served an electronic copy of the above and foregoing **SECOND MOTION TO MODIFY CONDITIONS OF SUPERVISED RELEASE** by electronic service (ECF) to the person named below:

/s/ *Brandon Thomas*
Employee of the Federal Public Defender